



Tulchin, Matt

From: Harden, Chartevia <chartevia.harden@ncdps.gov>
Sent: Friday, October 25, 2024 11:10 AM
To: Rodriguez, Orlando; Fort, Joseph W; Ray, Ashby T
Cc: Tulchin, Matt
Subject: RE: [External] Updated approach for your search request

Good morning Orlando,

The data has been picked up by your team. I will send you the information you need to access the data.

Thank you,

Chartevia Harden

IT Security & Compliance Specialist II
N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>
Sent: Thursday, October 24, 2024 8:51 AM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T <mtulchin@ncdoj.gov>
Subject: RE: [External] Updated approach for your search request

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Good morning, Chartevia.

We can have someone pick it up tomorrow. Say 10:30?

Here name is Katie Giblin, one of our paralegals. Can you send me the location info again?

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Harden, Chartevia <chartevia.harden@ncdps.gov>
Sent: Thursday, October 24, 2024 8:13 AM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>
Subject: RE: [External] Updated approach for your search request

Good morning Orlando,

Can we coordinate for pick up tomorrow morning? I still have uploads going at the moment but should be done later today. I will be in training all next week so if we can make it happen tomorrow that would be great.

Respectfully,

Chartevia Harden

IT Security & Compliance Specialist II
N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Harden, Chartevia
Sent: Tuesday, October 15, 2024 5:34 PM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T
Subject: RE: [External] Updated approach for your search request

Good afternoon,

Thanks for the follow up. I have noted your additional submissions and will work them into the request.

We are currently managing a high volume and a variety of tasks, rest assured as we work diligently to address all request efficiently, this request is a high priority.

The files from your previous submission are in the final stages of preparation, they should be ready tomorrow EOB... exports and downloads are done, many of the results produced multiple files due to the size of the file. I am working on labeling/naming the files to eliminate confusion.

Respectfully,

Chartevia Harden

IT Security & Compliance Specialist I
DIT- Public Safety
(919) 324-6179
chartevia.harden@ncdps.gov

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>
Sent: Tuesday, October 15, 2024 2:49 PM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>

Cc: Tulchin, Matthew T <mtulchin@ncdoj.gov>

Subject: [External] Updated approach for your search request

Importance: High

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Hey Chartevia,

I hope all is well.

A couple of things.

First, I wanted to check in on how the email pull for RPD 12, RPD 13-1, RPD 14, RPD 19, RPD 21-1, RPD 29, RPD 30, RPD 31, RPD 47 and RPD 50. These were the RPDs that Plaintiffs' counsel cleared and did not have any more follow up questions. I understand you have a small team working on these (and all other similar requests) and by no means intend to rush you. I am just curious on timing for planning purposes.

Second, with respect to the other RPDs, see below.

- RPD 21-2:
 - o Plaintiffs have agreed to modify this search to use a NEAR(50) proximity modifier, which results in the following search term:

(long* OR length OR time OR duration) NEAR(50) (cell OR room)
 - **Please run this pull with search term indicated immediately above.**
- RPDs 41 and 46:
 - o **Please run the terms as you wrote it up on the most recent chart.**
- RDP 54:
 - o Plaintiffs have agreed to remove "juvenile," "youth," and "minor" from this search term and to reduce the proximity modifier to NEAR(100), which results in the following search term:

(inspect* OR audit* OR monitor* OR "site visit*") NEAR(100) (center* OR detention OR facilit* OR YDC OR JDC OR DC OR alexander OR cabarrus OR chatham OR cumberland OR dillon OR lenoir OR hanover OR pitt OR Jenkins OR wake)
 - **Please run this pull with search term indicated immediately above.**

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Rodriguez, Orlando
Sent: Tuesday, October 1, 2024 2:36 PM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>
Subject: RE: [External] RE: Updated approach for your search request

Thanks, Chartevia.

I've sent this on to Ps' counsel.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Harden, Chartevia <chartevia.harden@ncdps.gov>
Sent: Monday, September 30, 2024 5:49 PM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>
Subject: RE: [External] RE: Updated approach for your search request

Good afternoon Orlando,

Please see the results of the edits submitted below in blue.

For the others, here is what Plaintiffs' counsel is requesting followed by my thoughts/requests in red:

- RPD 13-2 and 13-3: hold off for now.
 - o No complaint for us 😊
- RPD 21-2: they want us to try running that search w/50 and w/25 and see what the results are (instead of w/100).
 - o Can you rerun this and see if the count is lower
 - NEAR(50) - The search is completed
51,614 item(s) (21.49 GB)
7,024 unindexed items, 32.31 GB
 - NEAR(25)- The search is completed
23,846 item(s) (10.99 GB)
7,024 unindexed items, 32.31 GB
- RPDs 41 and 46: They want to know if we are able to tell which terms are driving the higher numbers? If so, they may be able to offer up alternative terms.
 - o If I recall based on our call the other day, the tool does not allow you to see which terms are pulling more data. If so, then I think we just tell him that we cannot tell which terms are driving the numbers.
 - This is correct.
- RPD 54: they want to know if we remove "juvenile", "youth", and "minor" from the search, does that lower the numbers significantly? If not, what about removing those terms plus changing the connector from w/200 to w/100?
 - o Can you rerun this and see if the count is lower?
 - Remove "juvenile", "youth", and "minor" from the search.- The search is completed
157,554 item(s) (58.66 GB)
7,022 unindexed items, 32.31 GB
 - Remove "juvenile", "youth", and "minor" from the search, edit NEAR(100).- The search is completed

140,476 item(s)
(52.81 GB)
7,022 unindexed
items, 32.31 GB

Respectfully,
Chartevia

Chartevia Harden

IT Security & Compliance Specialist II
Division of Adult Correction/Public Safety

N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>
Sent: Friday, September 27, 2024 5:09 PM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T <mtulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@NCDOJ.GOV>
Subject: RE: [External] RE: Updated approach for your search request

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Hey Chartevia – let's get started with the data pull for the following RPDs:

- RPD 12,
- RPD 13-1
- RPD 14
- RPD 19
- RPD 21-1
- RPD 29
- RPD 30
- RPD 31
- RPD 47
- RPD 50

For the others, here is what Plaintiffs' counsel is requesting followed by my thoughts/requests in red:

- RPD 13-2 and 13-3: hold off for now.
 - o No complaint for us 😊
- RPD 21-2: they want us to try running that search w/50 and w/25 and see what the results are (instead of w/100).
 - o Can you rerun this and see if the count is lower?
- RPDs 41 and 46: They want to know if we are able to tell which terms are driving the higher numbers? If so, they may be able to offer up alternative terms.
 - o If I recall based on our call the other day, the tool does not allow you to see which terms are pulling more data. If so, then I think we just tell him that we cannot tell which terms are driving the numbers.

- RPD 54: they want to know if we remove "juvenile", "youth", and "minor" from the search, does that lower the numbers significantly? If not, what about removing those terms plus changing the connector from w/200 to w/100?
 - o Can you rerun this and see if the count is lower?

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Rodriguez, Orlando
Sent: Monday, September 23, 2024 11:40 AM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@NCDOJ.GOV>
Subject: RE: [External] RE: Updated approach for your search request

Thanks, Chartevia.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Harden, Chartevia <chartevia.harden@ncdps.gov>
Sent: Thursday, September 19, 2024 9:38 AM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>
Subject: RE: [External] RE: Updated approach for your search request

Greetings Orlando,

The spreadsheet has been updated with new data added to the Plaintiff's proposed revised search term column. Please feel free to reach out if you have any questions.

Respectfully,

Chartevia Harden

IT Security & Compliance Specialist II
Division of Adult Correction/Public Safety
N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>
Sent: Friday, September 13, 2024 12:02 PM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T <mtulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@NCDOJ.GOV>
Subject: Re: [External] RE: Updated approach for your search request

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Yes, thank you for confirming.

Be well,

Orlando L. Rodriguez

From: Harden, Chartevia <chartevia.harden@ncdps.gov>
Sent: Friday, September 13, 2024 11:34:59 AM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>
Subject: RE: [External] RE: Updated approach for your search request

Orlando,

I wanted to confirm that you prefer to breakup those itemized searches individually? For example the way I tested 13 into 13-1,13-2 and 13-3? I'll send all of the data (criteria) we discussed in the results.

Respectfully,

Chartevia Harden

IT Security & Compliance Specialist II
Division of Adult Correction/Public Safety

N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Harden, Chartevia
Sent: Friday, September 13, 2024 9:52 AM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T; Whitaker, Bethel
Subject: RE: [External] RE: Updated approach for your search request

Hi Orlando,

Can you jump on a quick Teams call this morning? If so, please suggest a time and I'll be sure to be available.

Thanks,

Chartevia Harden

IT Security & Compliance Specialist II
Division of Adult Correction/Public Safety
N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>
Sent: Friday, September 13, 2024 9:43 AM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T <mtulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@NCDOJ.GOV>
Subject: RE: [External] RE: Updated approach for your search request

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That works. But before you start the download/upload, send over the data after the new pull so I can share that with Ps' counsel.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

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From: Harden, Chartevia <chartevia.harden@ncdps.gov>
Sent: Friday, September 13, 2024 9:42 AM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>
Subject: RE: [External] RE: Updated approach for your search request

Good morning,

To streamline the process, I plan to transfer the data onto a drive I currently have and then swap out the drives, minimizing your need for multiple trips. We can coordinate for a mid-week (Wed) drop-off if that suits you, or I can follow up on Monday with a more precise time frame after I've had more time to work on the request.

Regards,

Chartevia Harden

IT Security & Compliance Specialist II
Division of Adult Correction/Public Safety
N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>
Sent: Friday, September 13, 2024 9:30 AM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T <mtulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@NCDOJ.GOV>
Subject: RE: [External] RE: Updated approach for your search request

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Good morning, Chartevia.

When would be a good day/time next week to drop off the hard drive?

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Harden, Chartevia <chartevia.harden@ncdps.gov>
Sent: Wednesday, September 11, 2024 3:30 PM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>
Subject: RE: [External] RE: Updated approach for your search request

Orlando,

We are working diligently to complete this as quickly as possible. We appreciate your patience and will keep you updated on the progress.

Thank you,

Chartevia Harden

IT Security & Compliance Specialist II
Division of Adult Correction/Public Safety
N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>
Sent: Wednesday, September 11, 2024 12:50 PM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T <mtulchin@ncdoj.gov>
Subject: [External] RE: Updated approach for your search request

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Chartevia,

Please proceed with re-running the search (using the second set of parameters that Plaintiffs suggested) with the alternative syntax.

Once that is complete, please update the spreadsheet to show the resulting data for each of the searches.

Plaintiffs' counsel is asking about how long you think this re-run may take?

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Rodriguez, Orlando
Sent: Wednesday, September 11, 2024 11:50 AM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>
Subject: RE: Updated approach for your search request
Importance: High

Thank you, Chartevia.

We're going to talk with Ps' counsel later this afternoon. I'll circle back after that. But I think this sounds like a good plan.

Can you tell us what the alternative syntax is? It'd be helpful, in case Ps' counsel asks during our call.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Harden, Chartevia <chartevia.harden@ncdps.gov>
Sent: Wednesday, September 11, 2024 11:47 AM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matt <MTulchin@ncdoj.gov>
Subject: Updated approach for your search request

Good morning,

After reviewing your concerns and the recent search request, I have discovered that using a different syntax will optimize results with our Microsoft tool. While I initially used the exact criteria (Boolean operators) you provided, I have noted some limitations with this approach.

To improve the accuracy and efficiency of your requested search, I recommend using an alternative syntax that better aligns with the tool's capabilities. I have already started working on this and would appreciate your confirmation to proceed with it.

Please let me know if you agree with this adjustment as it will require us to coordinate another pick up to swap out devices.

Thank you,

Chartevia Harden

IT Security & Compliance Specialist II
Division of Adult Correction/Public Safety
N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Harden, Chartevia
Sent: Tuesday, September 10, 2024 1:59 PM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T
Subject: RE: [External] FW: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Hi Orlando,

I will review the details further and get back to you.

Thanks,

Chartevia Harden

IT Security & Compliance Specialist II
Division of Adult Correction/Public Safety
N.C. Department of Information Technology
Office: 919-324-6179
chartevia.harden@ncdps.gov

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>
Sent: Tuesday, September 10, 2024 10:09 AM
To: Harden, Chartevia <chartevia.harden@ncdps.gov>; Fort, Joseph W <joe.fort@ncdps.gov>; Ray, Ashby T <ashby.ray@ncdps.gov>
Cc: Tulchin, Matthew T <mtulchin@ncdoj.gov>
Subject: [External] FW: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land
Importance: High

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Good morning, Chartevia,

Please see the issue below that Plaintiffs' counsel has raised.

It does seem that the second search should have included the 352 that the first search captured, plus more given the additional custodians and the additional year. But the second search, which was broader, turned up only 9 hits. I'm not sure how that can be, unless there was something amiss with the first search (e.g. "children alliance" was run as "children" "alliance") or there was something funky with the second search.

Any insight you could provide would be most appreciated.

Happy to hop on a call, if that's easier.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Rob Lindholm <robert.lindholm@nelsonmullins.com>

Sent: Monday, September 9, 2024 9:52 PM

To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Soren Young <soren.young@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>

Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>

Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Orlando,

Can we set up a time this week to discuss the results in the Excel file you attached below? I have some concern that the new results in Column D don't make sense in many cases. For example, Defendants previously ran "Children's Alliance" over 10 custodians and that yielded 352 items (row 18, RPD 50). We proposed that the search be broader and asked Defendants to run "children* w/3 alliance". Our proposed search should have picked up every one of the previous hits plus more because the search was broader, we added an additional year, and we added 7 named custodians plus supervisors, assistant directors, teachers/educational department employees at each juvenile detention center, and mental health services staff at each juvenile detention center. Instead, the excel file states that it actually decreased to just 9 documents. I'm struggling to see how that would be possible. There are other revised counts that similarly seem problematic.

Please let me know when you are available to meet and confer this week. Thank you.

Best,
Rob

ROBERT L. LINDHOLM PARTNER

robert.lindholm@nelsonmullins.com

301 S. COLLEGE STREET | 23RD FLOOR

CHARLOTTE, NC 28202

T 704.417.3231 F 704.377.4814

330 MADISON AVENUE | 27TH FLOOR

NEW YORK, NY 10017

T 212.413.9006 F 646.428.2610

NELSONMULLINS.COM VCARD VIEW BIO

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>

Sent: Tuesday, September 3, 2024 1:37 PM

To: Rob Lindholm <robert.lindholm@nelsonmullins.com>; Soren Young <soren.young@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>

Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>

Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Rob,

The updated data amounts are in bold in column D just underneath the revised search terms. Some searches were higher, but a quick scan indicates most were lower and some significantly lower.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Rodriguez, Orlando
Sent: Tuesday, September 3, 2024 9:08 AM
To: Rob Lindholm <robert.lindholm@nelsonmullins.com>; Soren Young <soren.young@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@NCDOJ.GOV>; McHenry, Laura <LMcHenry@ncdoj.gov>
Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>
Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Good timing, Rob.

Just got word that the pull is complete. We should be uploading the data soon to begin our review.

I believe the revised search parameters did cut down on the volume. I don't by how much, but I can follow up.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Rob Lindholm <robert.lindholm@nelsonmullins.com>

Sent: Tuesday, September 3, 2024 8:58 AM

To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Soren Young <soren.young@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>

Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>

Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Orlando,

Can you please provide an update on when you plan to circulate updated counts on the search term strings/custodians we have been discussing in the email chain below? Thank you.

Best,
Rob



ROBERT L. LINDHOLM PARTNER
robert.lindholm@nelsonmullins.com

301 S. COLLEGE STREET | 23RD FLOOR
CHARLOTTE, NC 28202
T 704.417.3231 F 704.377.4814

330 MADISON AVENUE | 27TH FLOOR
NEW YORK, NY 10017
T 212.413.9000 F 646.428.2610
NELSONMULLINS.COM VCARD VIEW BIO

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>

Sent: Tuesday, August 13, 2024 3:54 PM

To: Soren Young <soren.young@nelsonmullins.com>; Rob Lindholm <robert.lindholm@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>

Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>

Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Thanks, Soren.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Soren Young <soren.young@nelsonmullins.com>

Sent: Tuesday, August 13, 2024 3:46 PM

To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Rob Lindholm <robert.lindholm@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>

Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>

Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Orlando,

That note is a shorthand referring Defendants to the search terms Plaintiffs have proposed for the preceding ("See above") or subsequent ("See below") requests. For instance, Plaintiffs' proposed search term for Request 29 also covers the subject matter of Request 28. Similarly, Plaintiffs' proposed search terms for Request 14 cover the subject matter of Requests 15, 17, 18, and 20.

Best,
Soren



SOREN YOUNG ASSOCIATE

soren.young@nelsonmullins.com

MERIDIAN | 17TH FLOOR

1320 MAIN STREET | COLUMBIA, SC 29201

T 803.255.9729 F 803.256.7500

NELSONMULLINS.COM VCARD VIEW BIO

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>

Sent: Tuesday, August 13, 2024 2:46 PM

To: Rob Lindholm <robert.lindholm@nelsonmullins.com>; Soren Young <soren.young@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>

Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>

Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Rob – for RPDs 15, 17, 18, 20, and 28, in your revised search terms column, you write “See below--terms below should capture information requested.” What does this mean? Are you wanting us to run the search as we proposed? Or are you trying to give us some other direction?

Be well,

Orlando

Special Deputy Attorney General

Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

Please note messages to or from this address may be public records.

From: Rob Lindholm <robert.lindholm@nelsonmullins.com>
Sent: Monday, August 12, 2024 3:43 PM
To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Soren Young <soren.young@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>
Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>
Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Orlando,

Thanks for the email. To the extent that the search terms pull back a small population of documents, for example, "Children* w/3 alliance", I think it probably makes sense to pull those and do your review. For the searches that previously came up with hundreds of thousands of documents for review or as revised come up with something similar, it would probably be useful for everyone if you sent us the new document counts and we can think about whether there is any way to revise the search to reduce the hit counts while still targeting responsive documents.

On RFP 14, if you could let me know what seems to be the driver of that hit count that would be helpful so we can try to potentially brainstorm lowering the volume. For example, if someone has one of the search terms in an email footer somehow or something similar it would be great to understand that so we can try to work around that. That RFP of course is central to our case.

Best,
Rob



ROBERT L. LINDHOLM PARTNER
robert.lindholm@nelsonmullins.com
301 S. COLLEGE STREET | 23RD FLOOR
CHARLOTTE, NC 28202
T 704.417.3231 F 704.377.4814

330 MADISON AVENUE | 27TH FLOOR
NEW YORK, NY 10017
T 212.413.9000 F 646.428.2610
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From: Rodriguez, Orlando <orodriguez@ncdoj.gov>
Sent: Monday, August 12, 2024 9:48 AM
To: Rob Lindholm <robert.lindholm@nelsonmullins.com>; Soren Young <soren.young@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>
Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>

Donna Tillis <donna.tillis@nelsonmullins.com>

Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land
Importance: High

Received. To confirm, are you envisioning that we would run these searches and provide you with the data amounts for you to review before we actually start the pull? Or are you wanting us to just do the pull based on this?

I ask because given that you're adding inboxes and expanding the date range, I anticipate the amounts will either stay the same or increase, even though you are adding limiting terms.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

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From: Rob Lindholm <robert.lindholm@nelsonmullins.com>

Sent: Friday, August 9, 2024 9:36 PM

To: Rodriguez, Orlando <orodriguez@ncdoj.gov>; Soren Young <soren.young@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>

Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>

Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land

Orlando,

Attached are our proposed edits in red to the search terms you proposed. In addition to the additional custodians we proposed in the attached, we believe Defendants need to also include as custodians the supervisors at each of the juvenile detention centers for the relevant time period (including supervisors who are no longer there, such as Talonda Johnson at Cabarrus), the assistant directors at each facility (such as Ryan Abbott at Cabarrus), teachers/educational department employees at each juvenile detention center, and mental health services staff at each juvenile detention center.

Let me know if you would like to discuss. Thanks.

Best,
Rob



ROBERT L. LINDHOLM PARTNER
robert.lindholm@nelsonmullins.com

301 S. COLLEGE STREET | 23RD FLOOR
CHARLOTTE, NC 28202
T 704.417.3231 F 704.377.4814

330 MADISON AVENUE | 27TH FLOOR
NEW YORK, NY 10017
T 212.413.9000 F 646.428.2610
NELSONMULLINS.COM VCARD VIEW BIO

From: Rodriguez, Orlando <orodriguez@ncdoj.gov>

Sent: Friday, July 26, 2024 10:15 AM

To: Rob Lindholm <robert.lindholm@nelsonmullins.com>; Soren Young <soren.young@nelsonmullins.com>; Tulchin, Matt <MTulchin@ncdoj.gov>; Whitaker, Bethel <bwhitaker@ncdoj.gov>; McHenry, Laura <LMcHenry@ncdoj.gov>

Cc: Duprey, Michelle <MDuprey@cfcrights.org>; Matthew Lindenbaum <matthew.lindenbaum@nelsonmullins.com>; Donna Tillis <donna.tillis@nelsonmullins.com>

Subject: RE: Doe 1, et al., v. NCDPS et al, (1:24-CV-17)(MDNC) - Ds' responses to Ps' Request for Entry Upon Land
Importance: High

Rob,

During our meet and confer last week, you all requested that we share the data amounts for the contemplated search terms. I just received that information back and it is attached.

Please let us know if you wish to scale back some of the search terms or whether you are fine with us pulling down this data as indicated in the spreadsheet. As I mentioned during the meet and confer, this is a labor intensive and time consuming process, so the Department's IT folks really only want to do this once. Thus, we'll wait to begin the scrap and download until we get clarity and agreement on the parameters.

Be well,

Orlando

Special Deputy Attorney General
Special Litigation Section
Phone: 919.716.6516
orodriguez@ncdoj.gov

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